

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**FIRST SUPPLEMENTAL VERIFIED STATEMENT OF PAUL HASTINGS LLP,
COLE SCHOTZ P.C. AND PARKINS & RUBIO LLP PURSUANT TO
BANKRUPTCY RULE 2019**

In connection with the chapter 11 case (the “**Chapter 11 Case**”) of the above-captioned debtor in possession (the “**Debtor**”), Paul Hastings LLP (“**Paul Hastings**”), Cole Schotz P.C. (“**Cole Schotz**”) and Parkins & Rubio LLP (“**Parkins & Rubio**”, and together with Paul Hastings and Cole Schotz, “**Counsel**”) hereby submit this first supplemental verified statement (the “**Supplemental 2019 Statement**”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) in connection with Counsel’s representation of the Ad Hoc Committee of Supporting Counsel (the “**AHC of Supporting Counsel**”).

1. The AHC of Supporting Counsel has formed to advance the common interests of the law firms, each of which has entered into a plan support agreement (each, a “**PSA**”) with the Debtor, Johnson & Johnson (“**J&J**”) and Johnson & Johnson Holdco (NA) Inc. (“**Holdco**”). The law firms on the AHC of Supporting Counsel contain members of the mass tort plaintiffs’ bar who have led the talc litigation for over a decade, including two former members of the Official Committee of Talc Claimants in the first bankruptcy brought by the Debtor. The AHC of Supporting Counsel’s clients include the vast majority of talc claims, and about 50% of those talc claimants with claims filed in federal and state courts.

2. On May 9, 2023, the AHC of Supporting Counsel filed the *Verified Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019* [Docket No. 470] (the “**Initial 2019 Statement**”). Pursuant to Bankruptcy Rule 2019, the Initial 2019 Statement contained firm and claimant information for the initial 15 firms that provided the requisite information and consents to join the AHC of Supporting Counsel.

3. Since filing the Initial 2019 Statement, two additional firms, De la Rosa Law Firm and Ferrer Poirot Wansbrough (collectively, the “**Additional Members**”), have provided the requisite information and consents to join the AHC of Supporting Counsel.

4. Attached hereto as Exhibit A is a list of the names and addresses for each of the Additional Members and the number of clients (each a “**Client**”, and collectively the “**Clients**”) represented by each Additional Member. Counsel does not represent the individual Additional Members or the Clients.

5. Each of the Additional Members has consented to Counsel’s representation of the AHC of Supporting Counsel.

6. De la Rosa Law Firm. Attached hereto as Exhibit B-1 is a list of the names and addresses for each Client represented by the De la Rosa Law Firm as of the date of this Supplemental 2019 Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

7. The information set forth in Exhibit B-1 is based on information provided to the De la Rosa Law Firm by the De la Rosa Law Firm Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

8. Each of the De la Rosa Law Firm Clients have signed an engagement letter with the De la Rosa Law Firm (the “**De la Rosa Law Firm Retainer Agreement**”). Attached hereto as Exhibit B-2 is a copy of a form of the De la Rosa Law Firm Retainer Agreement.

9. Ferrer Poirot & Wansbrough. Attached hereto as Exhibit C-1 is a list of the names and addresses for each Client represented by Ferrer Poirot & Wansbrough as of the date of this Supplemental 2019 Statement, together with the nature of the claim, each of which is unliquidated, held by each Client in relation to the Debtor.

10. The information set forth in Exhibit C-1 is based on information provided to Ferrer Poirot & Wansbrough by the Ferrer Poirot & Wansbrough Clients and is intended to comply with Bankruptcy Rule 2019 and not for any other purpose.

11. Each of the Ferrer Poirot & Wansbrough Clients have signed an engagement letter with Ferrer Poirot & Wansbrough (the “**Ferrer Poirot & Wansbrough Retainer Agreement**”). Attached hereto as Exhibit C-2 is a copy of a form of the Ferrer Poirot & Wansbrough Retainer Agreement.

12. The information contained in Exhibits A-C attached hereto is based upon information provided by the Additional Members to Counsel or by the Clients to the individual Additional Members and is subject to change.

13. As of the date of this Supplemental 2019 Statement, Counsel represents only the AHC of Supporting Counsel and does not represent or purport to represent any persons or entities other than the AHC of Supporting Counsel, including the Additional Members, in connection with the Debtor’s Chapter 11 Case.

14. The information contained in this Supplemental 2019 Statement and Exhibits A-C attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. Nothing contained herein should be construed as a limitation or waiver of any rights of any Additional Member or any of the Clients, including, without limitation, the right to assert, file and/or amend its claims in accordance with any applicable orders entered in this Chapter 11 Case.

15. The information contained in Exhibits A-C attached hereto is based upon information provided by the applicable Additional Member or the Clients. As set forth on Exhibit D hereto, each of the Additional Members has executed an acknowledgement to this Supplemental

2019 Statement stating that the information provided herein with respect to their respective Clients is true and correct to the best of their knowledge. Counsel does not make any representation regarding the validity, amount, allowance, or priority of such claims, and reserves all rights with respect thereto. Counsel does not own, nor have they ever owned, any claims against or interests in the Debtor, except for claims for services rendered to the AHC of Supporting Counsel, including the Additional Members. The AHC of Supporting Counsel, through Counsel, reserves the right to further amend and/or supplement this Supplemental 2019 Statement in accordance with the requirements set forth in Bankruptcy Rule 2019 at any time in the future.

Dated: June 16, 2023

COLE SCHOTZ P.C.

/s/ Michael D. Sirota

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